## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA,

Mainties

Plaintiff,

v. \* CR. NO. 2:06CR155-MHT

\*

QUINTRELL MARTIN,

Defendant . \*

MOTION TO RECONSIDER DENIAL OF UNOPPOSED MOTION TO CONTINUE BY DEFENDANT

Comes now Defendant Quintrell Martin, through counsel, and moves the Court to reconsider it denial of his previous Motion to Continue and as grounds therefor says as follows:

- 1. Since arraignment in this cause, the government has conducted an ongoing investigation involving matters related to this case and which involves other potential charges. That investigation is not complete.
- 2. The defendant and the government have made efforts to reach a plea agreement in this cause, but undersigned counsel believes that certain issues cannot be resolved until the the ongoing investigation progresses further.
- 3. It is believed by the parties that this continuance may lead to resolution of this cause without trial.
- 3. Verne H. Speirs, A.U.S.A., and undersigned counsel attempted to place a conference call to the Court this date to discuss this matter and were informed that the Court was in trial. Defendant requests an opportunity to meet with the Court through an in-chambers conference or a conference call to discuss this motion.

Respectfully submitted on this the 4th day of October, 2006.

s/BRUCE MADDOX (MAD013) Attorney for Quintrell Martin

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## **CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of the filing to all parties.

s/BRUCE MADDOX